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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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**AUG 19 1998**

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

In the Matter of	)	
	)	
Administration of the North American	)	CC Docket No. 92-237
Numbering Plan Carrier Identification	)	
Codes (CICs)	)	
	)	
MCI Petition for Emergency Stay	)	DA 98-1638

**COMMENTS OF SPRINT CORPORATION**

On August 12, 1998, MCI Telecommunications Corporation ("MCI") filed with this Commission a petition for Emergency Stay of the September 1, 1998 phase-out deadline for blocking of three-digit carrier identification codes ("CICs"). In support of its petition, MCI makes sweeping allegations about the end office conversion activities of local exchange carriers ("LECs"). Since MCI cited to the activities of the Sprint Local Telephone Companies in its petition, Sprint Corporation ("Sprint") offers the following response.

MCI claims that it has conducted field tests that prove the LECs have failed to comply with the Commission's directive to convert to four-digit CICs by September 1, 1998. Specifically, MCI claims that callers routed to the intercept announcement deployed by the LECs encounter unacceptably long delays without call completion and that only 44 percent of LEC end offices have been

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converted to accept the 4-digit CIC. While Sprint cannot speak to the applicability of MCI's claims with respect to other LECs, Sprint strenuously denies the validity of either claim as they pertain to its own LEC operations.

Regarding its claim that callers experience prolonged ringing when routed to the CIC intercept announcement, MCI fixates on problems it maintains exist in Bell Atlantic's territory. While suggesting that the Sprint LECs are having similar problems, MCI does not provide any facts or even examples of delays in reaching the intercept message in the Sprint LEC territories. Sprint certainly agrees that it is important that 10XXX calls to converted end offices be routed to the intercept message promptly and that allowing a call to ring up to 20 times before reaching the intercept message is unreasonable and unacceptable, and that any LEC which experiences such delays should be required to implement corrective action immediately, with such actions to be completed prior to September 1, 1998. However, to date, no Sprint LEC has received a complaint from an end-user customer, a carrier, or MCI itself reporting delay time associated with the intercept announcement. The Commission should, therefore, dismiss MCI's baseless allegations on this point.

Sprint is likewise troubled by the lack of accuracy surrounding MCI's allegations regarding the number of LEC end offices that were, as of the first

week of August, capable of supporting four-digit CICs. Here again, Sprint can only speak to the activities of its own LECs, and to that point asserts that if MCI had made the effort to actually check its facts with respect to the Sprint LECs' conversion activities, it would have found that, as summarized below, as of the first part of August, Sprint's end office conversions are nearly completed.<sup>1</sup>

- North Central (including Ohio, Indiana, Illinois, Pennsylvania and New Jersey) – completed July 18, 1998.
- Florida – completed July 30, 1998.
- Mid-Atlantic (including North Carolina, South Carolina, Tennessee, and Virginia) – 99.7 percent completed and will be ready by September 1<sup>st</sup>.
- Midwest (including Kansas, Missouri, Minnesota, Texas, Nevada, Oregon, Wyoming, Nebraska, and Washington) - currently 95 percent complete and will be ready by September 1<sup>st</sup>.

MCI's petition is riddled with fallacies and misstatements. The facts show that, contrary to MCI's claims, it is not necessary – or even advisable at this late date – for the Commission to interrupt the conversion process or otherwise delay the September 1<sup>st</sup> implementation deadline. The deadline has already been delayed twice, resulting in customer backlash and confusion. MCI presents no valid reason for adding to that confusion by instituting a further delay. MCI has

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<sup>1</sup> Similarly, if MCI had checked its facts concerning how Sprint's end office conversions are accomplished, it would know that CIC conversion is a translation-driven process; no "CIC software" installation is involved, as MCI claims at page 4 of its petition.

not and cannot meet its burden of proof regarding the necessity for a stay.

Therefore, MCI's petition should be denied.

Respectfully submitted,  
SPRINT CORPORATION

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August 19, 1998

## CERTIFICATE OF SERVICE

I, Melinda L. Mills, hereby certify that I have on this 19<sup>th</sup> day of August 1998, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Comments of Sprint Corporation" in the Matter of Administration of the North American Numbering Plan Carrier Identification Codes (CICs), CC Docket No. 92-237, filed this date with the Secretary, Federal Communications Commission, to the persons on the attached service list.

  
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